

April 18, 2025

VIA CM/ECF

Honorable J. Brendan Day
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Joint Letter re *MacLean, et al. v. Wipro Limited*, No. 3:20-3414-GC-JBD

Dear Judge Day:

In accordance with the Court's April 4, 2025 Order, *see* Dkt. 98, Plaintiffs Gregory MacLean, Rick Valles, Ardeshir Pezeshki, James Gibbs, and Ronald Hemenway ("Plaintiffs") and Defendant Wipro Limited ("Wipro") hereby submit this joint letter regarding the status of the parties' agreement on ESI custodians and apprising the Court of anticipated next steps and timing for the collection, review, and production of ESI.

The parties conferred and have reached agreement on a list of 26 custodians. Wipro has already collected custodial emails, will complete custodial email collection for the remaining custodians, and will investigate the non-email custodial ESI available for all 26 custodians. The parties will negotiate the types of electronic files that should be searched for responsive documents and the search terms to identify responsive custodial ESI, and during this process, pursuant to the Court's June 11, 2024 Order (Dkt. 63) will "discuss whether relevant requested documents and/or data belonging to those custodians may have been lost or deleted and, if so, whether backups of that ESI exist." After the parties reach agreement on a set of search terms and what electronic files should be searched for responsive documents, Wipro will begin its review and produce responsive documents on a rolling basis. The parties will provide the Court with a further update in a joint letter no later than three business days before the telephonic conference scheduled for July 2, 2025.

The parties thank Your Honor for his attention to this matter.

Respectfully submitted,

/s/ Jonathan Rudnick
Jonathan Rudnick
Daniel Kotchen (*pro hac vice*)

/s/ Seton Hartnett O'Brien
Seton Hartnett O'Brien
Greta Williams (*pro hac vice*)

Attorneys for Plaintiffs and Putative Class

Attorneys for Defendant Wipro Limited

Joint Letter to Judge Day
April 18, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record by electronic service through the Court's CM/ECF system.

/s/ Seton Hartnett O'Brien
Seton Hartnett O'Brien